

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

<p>AIG EUROPE S.A. a/s/o UNILEVER UNITED STATES, INC. and CONOPCO, INC. d/b/a UNILEVER, UNILEVER UNITED STATES, INC., and CONOPCO, INC.,</p> <p style="text-align: center;">Plaintiffs,</p> <p>v.</p> <p>C&S WHOLESALE GROCERS, INC. and A.E.D.S LLC,</p> <p style="text-align: center;">Defendants</p>	<p>Case No: 3:21-CV-01212-JFS</p> <p>JURY TRIAL DEMANDED</p>
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**MOTION TO ENLARGE TIME TO FILE A RESPONSIVE PLEADING OF
DEFENDANT, C&S WHOLESALE GROCERS, INC.**

1. Defendant, C&S Wholesale Grocers, Inc. (“C&S”), respectfully requests that this Honorable Court enlarge the time for filing of C&S’s response to Plaintiff’s complaint by fourteen (14) days from November 2, 2021.

2. If granted, C&S’s response to Plaintiff’s Complaint would be due on or before November 16, 2021.

3. C&S’s response is currently due on November 2, 2021.

4. C&S and Plaintiff have been conducting good-faith settlement negotiations over the past weeks, which negotiations could well result in a settlement as between Plaintiff and C&S.

5. Plaintiff’s Complaint is composed of some 75 paragraphs. It would take significant time and money for C&S to prepare the response. These resources could be saved if the parties resolve the case through settlement.

6. Settlements are to be encouraged and resources should be conserved if possible.

7. Plaintiff's counsel has consented to a 14-day enlargement, should this Honorable Court be disposed to grant such enlargement.

Respectfully submitted,

LEWIS BRISBOIS BISGAARD & SMITH

/s/ Donald H. Smith

Donald H. Smith (PA I.D. 41011)

One PPG Place | 28th Floor

Pittsburgh, PA 15222

donald.smith@lewisbrisbois.com

Tel: (412) 567-5596

Fax: (412) 567-5494

CERTIFICATE OF SERVICE

I, Donald H. Smith, hereby certify that a true and correct copy of the foregoing Motion to Enlarge Time to Respond to Plaintiff's Complaint on behalf of Defendant C&S Wholesale Grocers, Inc. was electronically served on all counsel on November 1, 2021 via the Court's ECF system.

/s/ Donald H. Smith
Donald H. Smith
Counsel for Defendant,
C&S Wholesale Grocers, Inc.